

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

FILED/RECD

UNITED STATES OF AMERICA

INDICTMENT

v.

Case No. 23-cr-70-jdp

KYLE RICHARDS,

Defendant.

21 U.S.C. § 841(a)(1)
21 U.S.C. § 856(a)(1)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 2251(a)
18 U.S.C. § 2

THE GRAND JURY CHARGES:

COUNT 1

On or about October 9, 2022, in the Western District of Wisconsin, the defendant,

KYLE RICHARDS,

knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2).

COUNT 2

On or about May 4, 2023, in the Western District of Wisconsin, the defendant,

KYLE RICHARDS,

knowingly and intentionally possessed with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

(In violation of Title 21, United States Code, Section 841(a)(1)).

COUNT 3

From in or about April 2023, to on or about May 4, 2023, in the Western District of Wisconsin, the defendant,

KYLE RICHARDS,

knowingly used and maintained a place, specifically, 121 S. Main Street, Apartment 2, Janesville, Rock County, Wisconsin, for the purpose of manufacturing, distributing, and using controlled substances, specifically, cocaine, a Scheduled II controlled substance,

(In violation of Title 21, United States Code, Section 856(a)(1)).

COUNT 4

On or about May 4, 2023, in the Western District of Wisconsin, the defendant,

KYLE RICHARDS,

knowing he had previously been convicted of an offense punishable by a term of imprisonment exceeding one year, knowingly and unlawfully possessed in or affecting commerce a Ruger Mark II handgun, a Smith and Wesson revolver, a Smith and Wesson Model 59 handgun, and a Harrington and Richardson revolver, said firearms having previously traveled in and affected interstate commerce.

(In violation of Title 18, United States Code, Section 922(g)(1)).

COUNT 5

On or about January 13, 2023, in the Western District of Wisconsin, the defendant,

KYLE RICHARDS,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, RICHARDS used an iPhone to produce a video of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a)).

FORFEITURE ALLEGATION

1. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g)(1), set forth in Count 4 of this indictment, the defendant,

KYLE RICHARDS,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to: a Ruger Mark II pistol, a Smith and Wesson revolver, a Smith and Wesson Model 59 pistol, an American Double Action revolver, and ammunition.

2. As a result of the offense charged in Count 5 of this indictment, and upon conviction for violating Title 18, United States Code, Section 2251(a), pursuant to Title 18, United States Code, Section 2253, the defendant,

KYLE RICHARDS,

shall forfeit to the United States his right, title, and interest in:

(1) Any and all visual depictions which contain images which are or appear to be child pornography, together with the storage media in which they are contained, and

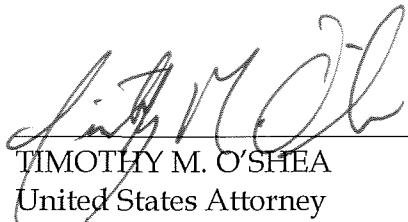
(2) any and all property used or intended to be used to commit or to promote the commission of the aforementioned offense.

A TRUE BILL



PRESIDING JUROR

Indictment returned: 7/19/2023



TIMOTHY M. O'SHEA
United States Attorney